

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
AVRAHAM GOLDSTEIN; MICHAEL GOLDSTEIN;
FRIMETTE KASS-SHRAIBMAN; MITCHELL
LANGBERT; JEFFREY LAX; MARIA PAGANO,

Plaintiffs,

-against-

**RULE 68 OFFER OF
JUDGMENT**

22 Civ. 00321 (PAE)

PROFESSIONAL STAFF CONGRESS/CUNY; CITY
UNIVERSITY OF NEW YORK; JOHN WIRENIUS, in his
official capacity as Chairperson of the New York Public
Employee Relations Board; ROSEMARY A. TOWNLEY, in
her official capacity as Member of the New York Public
Employee Relations Board; ANTHONY ZUMBOLO, in his
official capacity as Member of the New York Public
Employee Relations Board; CITY OF NEW YORK;
THOMAS P. DINAPOLI, in his official capacity as New
York State Comptroller,

Defendants.
-----X

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of New York, by and through its attorney, Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, hereby offers to allow Plaintiff Avraham Goldstein to take a judgment against the City of New York in this action for two hundred and twenty-three dollars and thirty-five cents (\$223.35), plus reasonable attorneys' fees, expenses, and costs accrued to date, for all claims that have been, or could have been, asserted in the Complaint in the above-captioned matter, to the date of this offer.

This judgment shall be in full satisfaction of all federal, state, and city law claims or rights that Plaintiff may have to damages, or any other form of relief, arising out of the alleged acts or omissions of City Defendant or any official, employee, or agent, either past or

present, of the City of New York, or any agency thereof, in connection with the facts and circumstances that are the subject of this action.

This Offer of Judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by the City Defendant or any official, employee, or agent of the City of New York, or any agency thereof; nor is it an admission that plaintiff has suffered any damages. This Offer of Judgment may only be accepted up to and including fourteen (14) days after service of this offer. If Plaintiff does not accept this offer within fourteen (14) days after service of this offer upon Plaintiff, this offer will be deemed rejected.

Acceptance of this Offer of Judgment will act to release and discharge Defendant, their successors or assigns, and all past and present officials, employees, representatives and agents of the City of New York, or any agency thereof, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action.

Acceptance of this Offer of Judgment also will operate to waive Plaintiff's rights to any claim for interest on the amount of the judgment.

The judgment shall contain and recite the terms and conditions set forth herein.

Dated: New York, New York
April 22, 2022

Hon. Sylvia O. Hinds-Radix
Corporation Counsel of the
City of New York
Attorney for Defendant City of New York
100 Church Street
New York, New York 10007

By: /s/
John F. Walpole
Assistant Corporation Counsel
(212) 356-2470

To: VIA FIRST CLASS MAIL and EMAIL

Nathan J. McGrath

The Fairness Center

Attorneys for Plaintiffs

500 North Third Street

Suite 600b

Harrisburg, PA 17101

844-293-1001